

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CHARLES MAMOU, JR.,	§	
	§	
Petitioner,	§	
	§	
vs.	§	CASE No. 4:14-CV-00403
	§	
WILLIAM STEPHENS,	§	
Director,	§	
Texas Department of Criminal	§	
Justice, Correctional Institutions	§	(Death Penalty Case)
Division,	§	(Judge Lee H. Rosenthal)
Respondent	§	
	§	

**INDEX OF EXHIBITS IN SUPPORT OF
AMENDED PETITION FOR WRIT OF HABEAS CORPUS**

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EXHIBIT**DESCRIPTION****EXHIBITS PREVIOUSLY FILED WITH THE PROTECTIVE SKELETAL PETITION:**

1	Complaint (12-10-98) and Indictment (3-3-1999)	CR 2-6
2	Defense Motion for Discovery of Victim Impact (9-1-1999)	CR 20-22
3	Defense Motion for the State to Reveal Agreements (9-1-1999)	CR 23-26
4	Defense Motion for Production and Disclosure of Informant (9-1-1999)	CR 49-51
5	Charge of the Court at Guilt/Innocence (10-12-1999)	CR 78-89
6	Verdict at Guilt/Innocence (10-12-1999)	CR 90
7	Charge of the Court at Punishment Phase (10-15-1999)	CR 95-100
8	Judgment/Sentence (10-15-1999)	CR 101-103, 105-107
9	Texas Court of Criminal Appeals, Opinion on Appeal (<i>State v. Mamou</i> , No. 73,708 (Tex. Crim. App. Nov. 7, 2001))	
10	Appellant's Brief, <i>State v. Mamou</i> , No. 73,708 (9-1-2000)	
11	State Application for Post-Conviction Writ of Habeas Corpus (<i>Ex parte Charles Mamou, Jr.</i> , No. 800112-A)	1 SHCR 3-55
12	Subsequent Pro Se State Application for Post-Conviction Writ of Habeas Corpus (<i>Ex parte Charles Mamou, Jr.</i> , No. 800112-A) (7-31-2013)	3 SHCR 6-29
13	Subsequent State Application for Post-Conviction Writ of Habeas Corpus (<i>Ex parte Charles Mamou, Jr.</i> , No. 800112-A) (10-29-2013)	1 SHCR 196-241
14	State's Proposed Findings of Fact, Conclusions of Law and Order (11-6-2013)	1 SHCR 242-257
15	Texas Court of Criminal Appeals, Opinion on Post-Conviction Applications (<i>Ex parte Charles Mamou, Jr.</i> , No. WR-78,122-01, 78,122-02 and 78,122-03 (2-5-2014))	
16	Affidavit of Ronald L. Singer	
17	Extracts from habeas petition in <i>Bernal v. Dretke</i> , No. 4:04-cv-01163 (S.D.Tex.) (5-25-2004)	

- 18 Houston Chronicle articles on Houston Police Dept. crime lab and State's witness Robert Baldwin
- 19 Schwartz, Adina, "A Systematic Challenge To The Reliability and Admissibility of Firearms and Toolmark Identification, VI Columbia Science and Technology Law Review (2005)
- 20 Houston Chronicle articles on State fingerprint expert Rafael Saldivar
- 21 Trial court "Order For Filing Affidavit" (12-11-2001)
- 22 State habeas counsel's "Motion for Evidentiary Hearing" (2-21-2002)
- 23 Declaration of Tom Moran
- 24 Affidavit of Claudia Milton
- 25 Affidavit of Christopher Terrill Mamou
- 26 Affidavit of Mark Benoit
- 27 Declaration of Sonja Dee Rafeet
- 28 State habeas counsel's "Motion For The Appointment of a Ballistics Expert" (1-10-2003)

EXHIBITS FILED WITH AMENDED PETITION:

- 29 Testimony of Robert Baldwin
- 30 *Williams v. Quarterman*, 551 F.3d 352 (5th Cir. 2008)
- 31 Resume of Ronald Singer
- 32 Resume of Prof. Adina Schwartz
- 33 Tobin, William A, and Blau, Peter J., "*Hypothesis Testing of The Critical Underlying premise of Discernible Uniqueness in Firearms-Toolmarks Forensic Practice*," 53 *Jurimetrics* 121-146 (2013).
- 34 Cole, Simon A., *Forensics Without Uniqueness, Conclusions Without Individualization: The New Epistemology of Forensic Identification*, 8 *Law, Probability & Risk* 233, 234 (2009).
- 35 AFTE Theory of Identification

- 36 Department of Justice letter from Special Counsel John Crabb Jr., May 6, 2013, in *Manning v. Mississippi*, 2013-DR-00491-SCT.
- 37 Saks, Michael J & Koehler, Jonathan J., *The Individualization Fallacy in Forensic Science Evidence*, 61 Vanderbilt L. Rev. 199-219 (2008)
- 38 Koehler, Jonathan J. & Saks, Michael J., *Individuation Claims in Forensic Science: Still Unwarranted*, 75 Brook. L. Rev. 1187 (2010)
- 39 Affidavit of Ronald L. Singer